

Baker & Hostetler LLP

45 Rockefeller Plaza

New York, NY 10111

Telephone: (212) 589-4200

Facsimile: (212) 589-4201

David J. Sheehan

Email: dsheehan@bakerlaw.com

Jimmy Fokas

Email: jfokas@bakerlaw.com

Kathryn M. Zunno

Email: kzunno@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)
SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

FRANK J. AVELLINO, *et. al.*,

Defendants.

Adv. Pro. No. 10-05421 (SMB)

**NOTICE OF APPEARANCE
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that pursuant to §1109(b) of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 9010(b), the undersigned hereby appears as counsel for Irving H. Picard, Esq. as Trustee for the substantively consolidated SIPA liquidation of the business of

Bernard L. Madoff Investment Securities LLC and estate of Bernard L. Madoff, under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, et seq., in the above-captioned adversary proceeding, and hereby requests, pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure and §1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the following person at the address, telephone, telecopier and email indicated:

Kathryn M. Zunno, Esq.
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
T 212.589.4200
F 212.589.4201
Email: kzunno@bakerlaw.com

PLEASE TAKE FURTHER NOTICE that, pursuant to §1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned case and proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of the rights (1) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, or (2) to any other rights, claims, actions, setoffs, or recoupments to which the above-named plaintiff is or may be entitled, in law or in

equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the above-named plaintiff expressly reserves.

Dated: New York, New York
May 14, 2015

/s/ Kathryn M. Zunno
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, New York 10111
Telephone: (212) 589-4200
Facsimile: (212) 589-4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Jimmy Fokas
Email: jfokas@bakerlaw.com
Kathryn M. Zunno
Email: kzunno@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and Estate of Bernard L. Madoff*